

EXHIBIT C

From: Matthias Kamber <mkamber@keker.com>
Sent: Friday, July 2, 2021 4:54 PM
To: Gannon, Kevin; kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Cc: Singular; Hayes, Paul
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS
Attachments: 2021 07 02 Kamber Ltr Designating Google Witnesses.pdf

Counsel,

Attached please find a letter identifying Google's corporate designees. Per your request, we can confirm that Mr. Shafiei's preparation will include discussions with Mr. Mabey, and that Google is supplementing its responses to interrogatories and document productions in accordance with the Court's guidance at the hearing. This includes the linked documents requested by way of the motion that Mr. Seeve argued before Google could file its opposition brief; as noted at the hearing, we were targeting to get that production out today and are on track to do so. Other supplemental productions, including of the financials discussed at the hearing, are also in progress and will be going out next week.

Regards,

Matthias

From: Gannon, Kevin <kgannon@princelobel.com>
Sent: Thursday, July 1, 2021 12:29 PM
To: kvp-singular <kvpsingular@keker.com>; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com; Matthias Kamber <MKamber@keker.com>
Cc: singular@princelobel.com; phayes@princelobel.com
Subject: RE: Singular Computing LLC v. Google LLC; Civil Action No. 1:19-cv-12551 FDS

[EXTERNAL]

Counsel,

In light of the Court's rulings from yesterday's hearing and the fast approaching July 23rd close of fact discovery, please let us know who will be Google's Rule 30(b)(6) designees for all topics in Singular's Notice of Deposition of Google LLC Pursuant to Fed. R. Civ. P. 30(b)(6) dated May 5, 2021 and provide us with deposition dates for same. We anticipate that Mr. Shafiei will likely be one of Google's designees with respect to financial topics. To the extent this is true, we expect he will be educated on those topics by Mr. Mabey. In addition, please confirm that Google will be supplementing its responses to Interrogatory Nos. 12-15 and 18-20 and producing documents responsive to Request for Production Nos. 39, 43, 44, 47-49, 82, 87, 103, 104, 105, 106, 107, 108, 110, 111, 112, 113, and 115 by tomorrow, July 2, 2021.

If we don't receive this information by the close of business tomorrow or at least a firm commitment to provide same no later than July 6, 2021, we will be contacting Judge Cabell on Tuesday, July 6, 2021.

Thanks,
Kevin

Kevin Gannon

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